

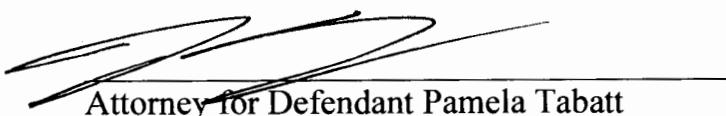
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:14 CR 187 JAR / DDN
)
)
PAMELA TABATT,)
RICHARD GROSS,)
PAUL BERRA, JR.,)
)
Defendants.)

MOTION OF DEFENDANT TO SUPPRESS EVIDENCE AND STATEMENTS

Comes now the defendant, by and through undersigned defense counsel, and moves the Court generally, perhaps to be followed up with a more specific documentary motion, for an order suppressing any arguably suppressible evidence, including without limitation any statements and physical evidence unlawfully acquired by the government, the government intends to offer into evidence at trial, and to conduct a pretrial evidentiary hearing on this motion.

Supporting authority will be provided after further review and an evidentiary hearing at which time the circumstances of the instant case may be established. The attorney for the defendant has personally conferred with the assistant United States Attorney regarding this matter and has a good faith belief this information and evidence exists.



Attorney for Defendant Pamela Tabatt

Signed on June 24, 2014.